

1. The Claimant
2. Simon Hughes
3. 7th Witness Statement
4. Signed 24 January 2026

CLAIM NO: KB-2022-003340

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST

B E T W E E N:

SIR SIMON HUGHES

Claimant

-and-

ASSOCIATED NEWSPAPERS LIMITED

Defendant

SEVENTH WITNESS STATEMENT OF SIMON HUGHES

I, **SIMON HUGHES**, of [address available to the Judge], **WILL SAY** as follows:

1. I am the Claimant in this action. I make this further statement in support of my claim for damages against the Defendant ("**Associated**"), the publishers of the *Daily Mail* and the *Mail on Sunday*.
2. Unless I have made it clear to the contrary, the facts and matters set out in this witness statement are within my own knowledge and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified and facts and matters from such other sources are true to the best of my knowledge and belief. This statement was drafted after discussions on the telephone and in person with my solicitor over the last few days and after considering the documents set out in the schedule to this statement.
3. I make this witness statement in response to Associated's Amended Rejoinder served on 21 January 2026, and particularly to the allegation in Paragraph 28A

that in 2019 I sought with others to conceal the true limitation position from the Court, which allegation I deny absolutely. The reasons and explanation for my denial are set out below and need to be understood in the context of the history of my three claims against newspaper companies, of which this is the most recent, for illegal behaviour in obtaining personal information about me.

4. Neither the information shared with me by *The Sun* in January 2006 that they had obtained billing records of my private telephone calls, nor the appearance of a photographer on my doorstep in April 2006 quizzing me about a personal relationship led me to start on any personal mission to track down any culprits guilty of illegal press behaviour. By 2006 I had already been in a public political role for about 25 years and had had to deal with intrusive press activity on many occasions. As a busy MP and senior party member my time was fully occupied with other constituency, London-wide, national and international issues.
5. -My personal interest and involvement increased after information was given to me by the police in October 2006 that I had been a victim too and that Glenn Mulcaire had been involved in my case. I asked the police at the time if anyone else was involved and was told 'no'. Press articles about hacking including particularly in *The Guardian* in 2009 kept the issue publicly alive. Before the 2010 general election, in parliament I pressed the Labour government to take further action.
6. In May 2010 Liberal Democrats negotiated and then entered a government coalition, and shortly afterwards I became our party's Deputy Leader.
7. In August 2011 I issued proceedings against NGN and Glenn Mulcaire for misuse of private information by the *News of the World* and Glenn Mulcaire, and - in disclosure in that claim - I was told by letter on 16 September 2011 that there were no further documents evidencing the identity of persons to whom Mr Mulcaire gave or sent information about me.
8. I am therefore clear that by this time the only newspaper organisation which I believed to have behaved in a way which justified legal action by me was NGN as owners of the *News of the World*, and that it was only after I had been shown in May 2011 the clear evidence to satisfy me of illegal press activity that I had decided to take my first ever civil action against a newspaper company. I issued proceedings within three months. These were settled in February 2012 with an admission by NGN of liability for blagging of confidential information and the illegal accessing of my voicemail messages, an apology and a payment of damages. I was aware at the time that in 2012 NGN also admitted to similar activity in relation to HJK and apologised and paid damages. I had no evidence at that stage to lead me believe that any other titles or companies were involved, though I still had not found how *The Sun* came to be involved.

9. As previously stated in my Trial Witness Statement last revised on 16 January 2026, I therefore said on the *Andrew Marr Show* on BBC TV on 12 February 2012 that although the *Daily Mail* and the *Mail on Sunday* had obtained information in a way they should not have done, I publicly accepted as correct from my knowledge at that time the statement of its editor that the *Daily Mail* and the Mail group had not been phone hacking - either my phone or generally. I believe this indicates my continuing careful approach to these matters, and that I only make allegations when I am confident that the evidence supports this.
10. I believed the statements by Associated's witnesses – not least because in the same month NGN admitted liability and illegality in my claim against it. In my written evidence to the Inquiry, I said nothing that made specific allegations of illegality against organisations other than NGN and had no grounds then to suggest that Associated's witnesses at the Inquiry had not told the truth or carried out full investigations into payments to private investigators or agents.
11. Up until 2007, as Mr Dacre stated and which is not denied by Associated, such payments could be made and were made without breach of company policy. Associated's policies and practices therefore permitted payment in June 2006 to Mr Miskiw, whose claim for payment was properly put forward by Chris Anderson and paid on John Wellington's authority.
12. Associated's Defence, in paragraph 19.1, sets out clearly the requirements imposed on Associated by the Inquiry section 21 Notice and the correspondence from Reynolds Porter Chamberlain. These included to disclose 'any fees or expenses' paid to private investigators or others with access to the same ...in the period from 1 January 2005 to 8 August 2011', which clearly includes June 2006. Further Associated admits that Mr Dacre, Mr Wright and Ms Hartley were required to address in their respective witness statements whether, to the best of their knowledge, the Mail Newspapers "used, paid or had any connection with private investigators in order to source stories or information and/or paid ...for such information from... others with access to the same, and if so, please provide details ... of the amounts paid to them."
13. Throughout this time and for several years later I neither had actual knowledge of sufficient facts to render this claim worthwhile then, nor could with reasonable diligence have discovered any such facts. Specifically, I had at this time no evidence to suggest that Glenn Mulcaire or Greg Miskiw or anyone else had in 2006 acted on behalf of or in the interests of the *Daily Mail* or the *Mail on Sunday* or had been paid by Associated or on its behalf. NGN had also admitted liability for all acts of Mr Mulcaire in December 2011 and February 2012.

14. Regarding the meeting with Evan Harris and Graham Johnson which took place, in Bermondsey on 5 April 2016, I have already set out the facts in my revised Trial Witness Statement. At this meeting I know that I was neither shown, nor informed about, emails between Greg Miskiw and Chris Anderson. I did not feel the need to report anything to my solicitor.
15. I have also stated in my Trial Witness Statement that the day before this meeting I had a short email exchange with HJK. I concluded from what he wrote to me that he did not have, or expect to have, any evidence to confirm who had doorstepped him in 2006.
16. In 2017 I finished full-time work with The Open University (it had been a fixed term contract) and later that year agreed to join the Spanish high speed train company TALGO to start work as their UK Strategic Advisor as it wished to plan for a possible bid for the UK HS2 rolling stock contract.
17. In 2019 work with Talgo supporting that company on the bid for the HS2 rolling stock was very demanding - and included work in Spain as well as many parts of the UK. It was at this time, and by email, on 19 February 2019 that Evan Harris made contact for the first time for to arrange to discuss a potential claim against the *Daily Mail*. This first discussion took place at a meeting on 1 March 2019. I considered this to be a preliminary information meeting, and this was the first time on which I became aware that I might have a case against Associated, but I was shown no documents, made no notes and therefore did not feel that I needed to contact my solicitor or anyone else about it.
18. I accept that I received a follow-up email from Evan Harris on 3 March 2019 headed "Simon Hughes possible claim against Mail" - with an attachment entitled "Victim Memo", but I did not pay attention to, consider, deal with, respond to or talk to anyone about this at the time, and I had not seen any previous similar documents. It was work on an imminent claim against NGN in relation to *The Sun* which was my only personal legal priority, more immediately I had considerable work as the chair of governors of a local secondary school and most importantly crucial legal and other meetings in Spain in several following days that week and later concerning my work with Talgo. (My work for Talgo has continued intensively until 2025.)
19. Both Evan Harris and Graham Johnson then sent me emails on 11 July 2019. Graham's email included some draft articles. Evan Harris then emailed me the following day to ask me to 'ignore these for now' and that he would send articles 'post-legal edit'. All this time I was very clear that I did not want any additional further publicity about events from 2006, both because of my work but also because I was submitting an important public sector job application in mid-July and did not want anything to prejudice this. When catching up with emails on 15

July 2019 I noted the receipt of the first email, said that I would look at the second later in the week, and then when asked by Evan to ignore them said 'OK'. This is what I did. The fact that I noted the first email did not mean, suggest or imply that I adopted, endorsed, encouraged or supported any of the arguments in it. I never have.

20. I wish now to deal specifically with the details of the contention of Associated in Paragraph 28A of the Amended Rejoinder that there was a '*Hughes Limitation Camouflage Scheme*'. I was never at any time part of any discussion or suggestion that publication dates of articles in *Byline Investigates* (a publication I believe that I had not previously heard of) could be used as a date or dates which I or others could use to argue that a *Byline* publication was what gave me the knowledge of facts to render a claim worthwhile.
21. I never responded to Evan Harris or anyone else at any time with any substantive expression of opinion or view on his email of 11 July 2019, or on the proposed articles, either on content or time for publication, because I did not at first sight give this any more than the glancing attention needed to acknowledge its receipt, and then when asked to ignore the articles did so. There did not then seem to be any need for a further substantive reply because there was now no proposal to reply to. I did, said or wrote nothing to suggest that I adopted or could have adopted or implemented such a proposal. In any event, I would never countenance such an idea or 'scheme', there is not a scintilla of evidence to suggest that I did, and I reject completely the inference that I might. I am a lawyer by training and past practice, have served as a MOJ Minister of State, understand the law on limitation and only initiate legal actions if I believe that I have good evidence to do so, and within time limits permitted by law.
22. At no time did I seek advice about camouflaging limitation. I did not receive any such advice, and did not authorise anyone to seek such advice or act on such advice on his behalf. I did not discuss with Mr Thomson or any other solicitor at Atkins Thomson such a strategy, nor – for the avoidance of doubt - with Evan Harris.
23. At no time did I believe that limitation was a problem in this case, as the justification for action needed first my actual or constructive knowledge of the evidence, and at the earliest this was 2019. As I had been told nothing of the prospect of any possible evidence to support a claim against Associated until the meeting of 1 March 2019, there was no limitation issue in July 2019 to camouflage, as six years from 1 March 2019 would have been 1 March 2025. I accept that the email of 3 March 2019 to me is evidence that for the first time on that date I had constructive notice of some facts to investigate a claim by me, even though I did not, until a lot later, consider any contents of the email and only saw the relevant documents and took legal advice about them in 2022.

24. I was never alerted until March 2019 to the existence of emails between Greg Miskiw and Chris Anderson or records of payments and did not see any of this evidence for myself until 2022. There was in 2019 nothing to conceal. I played no part in planning any camouflage scheme.

STATEMENT OF TRUTH

I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge.

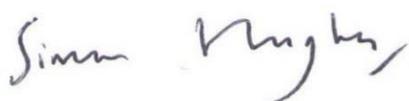
I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection in my own words.

On points that I understand to be important to the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



Sir Simon Hughes

Dated: 24 January 2026

I hereby certify that:

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to Simon Hughes .
3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signature:



Name: Mark Thomson

Position: Solicitor Advocate

Date: 24 January 2026

APPENDIX 1

Documents I have referred to, or been referred to, for the purposes of this statement

1. {A/29}
2. {K/1551}
3. {A/16}
4. {K/2045}
5. {K/2205}
6. {K/2208}
7. {K/2211}
8. {K/2216.3}